RCRA Compliance Evaluation Inspection Summary

Clean Harbors Kansas, LLC
2549 N. New York
Wichita, Kansas 67219

EPA ID No. : KSD 007 246 846

Inspection Date: September 9, 10, and 23, 2003

KDHE INSPECTOR: Debbie Travis and Steff Fackrell, SCDO

1.0 INTRODUCTION:

On September 9, 10, and 23, 2003 a routine inspection was conducted at Clean Harbors Kansas, LLC to determine compliance with state hazardous waste regulations and T/S/D status. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. We arrived at the facility at approximately 9:00 a.m. and met with John Martin, Operations Manager, and Brian Key, Manager of Clean Harbors Field Service Division.

2.0 CHANGES SINCE PREVIOUS INSPECTION:

This facility was previously owned and operated by Safety Kleen, Inc. On September 6, 2002, Clean Harbors Kansas, LLC became the owner and operator of this facility. Mr. Martin informed me that currently the facility is primarily a 10-day transfer facility (truck to truck). They do store some special waste longer than 10-days, but none longer than 365 days because it is cost effective to accumulate larger quantities prior to shipping for disposal. Clean Harbors laid off ten employees on January 31, 2002. Mr. Martin is the only employee for the site facility. Additionally, Clean Harbors Field Services Division is located at this site.

This facility (Safety Kleen) was last inspected as both a T/S/D and an EPA Generator of Hazardous Waste in June 2002. Nine violations were cited and corrected: two open satellite drums, one unlabeled satellite drum, one storage drum not in good condition, two storage containers with no accumulation start date, two drums with improper accumulation start dates, failure to maintain the roof on buildings (B, J, I, & D), 138 violations on the daily and weekly inspection logs, failure to provide 61 daily inspection logs, and failure to file a notice with the Secretary of KDHE for exporting hazardous waste to a foreign source five times. A hearing (Case No. 02-E0063) with Safety Kleen is pending concerning these violations.

3.0 INSPECTION:

Mr. John Martin accompanied us on the inspection of the facility. Refer to attachment 1

for the facility site map. The facility consists of buildings A, B, C, D, E, H, I, J, K, processing area, and drum dock area. Many of the buildings are empty, but they all contained the required safety equipment.

3.1 Building A

This building is currently storing office equipment and all manifest/tracking documents.

3.2 Building B

This building is currently empty. The building is permitted to store corrosive and non-ignitable hazardous waste.

3.3 Building C

This building is currently storing empty drums and packing material. The building is permitted to store ignitable and non-ignitable hazardous waste.

3.4 Building D

This building is currently storing empty drums and maintenance equipment. The building is permitted to store ignitable and/or non-ignitable or a combination of both materials. Additionally, there are eleven horizontal tanks mounted from the ceiling. The tanks have been cut open and are not currently in use. Refer to attachment 2 for the tank location map. In area D100 we observed one labeled and closed 55-gallon satellite drum containing flammable solids (D001, D018, D035, F003, F005). Mr. Martin informed us that truck drivers use this satellite drum for disposing of materials when they clean out the inside of their trucks.

Inside building D we observed standing water on the floor under the horizontal tanks. Refer to photograph 1. The leaking roof was identified on inspection logs October 29, 2002 (attachment 3), January 25, 2003 (attachment 4), and August 31, 2003 (attachment 5). **Violation 12(a)** was cited for failure to maintain the roof on building D.

3.5 Building E

This building houses the administrative offices for the facility.

3.6 Building H

This building houses the laboratory. Chemical analyses are conducted on samples collected from each waste material stored over 10 days.

3.7 Building I

This building is currently storing 11 containers of special hazardous waste. They were all labeled and closed. The special waste is typically stored for greater than 10 days but less than 365 days. The special waste is shipped for disposal when larger quantities have accumulated, which is more cost effective. The building is permitted to store ignitable, non-ignitable, reactive, non-reactive and other hazardous waste.

3.8 Building J

This building is currently empty. The building is permitted to store ignitable, non-ignitable, reactive, non-reactive, and other hazardous waste.

3.9 Building K

This building is currently storing office equipment. The building is a non-permitted building.

3.10 Processing Area

The processing area is currently not in operation. Within the processing area there are ten storage tanks. Refer to attachment 2 for the tank location map. Tank V-1 was operational from October 8, 2002 through January 31, 2003. During that time period V-1 stored waste oil. Currently, only tank V-17 is in use and stores the facilities truck fuel.

3.11 Drum Dock Area

The 10-day storage drums are managed in this area. The area is covered by a metal roof. We observed two labeled and closed satellite drums containing solid hazardous waste (D001, D018, D035, F003, F005). Additionally, we observed three rows of closed and labeled hazardous waste containers. Within one of the rows we observed a labeled, closed, and dented black 55-gallon drum containing hazardous waste liquid (D005, D008, D009). The dent was located over the seam of the drum. Refer to photographs 2 through 4. **Violation 10** was cited.

4.0 Record Review:

We reviewed the 2002 biennial report, contingency plan, personnel training documents, manifests, LDR's, and inspection logs from September 6, 2002 through September 9, 2003. Clean Harbors has a computer generated bar code and numbering system. Every container is labeled with a bar code for tracking.

Clean Harbor Kansas, LLC
EPA ID. No.: KSD 007 246 846

5.0 Exit Meeting:

Due to Mr. Martin's schedule the exit interview was not conducted until September 23, 2003. I returned to Clean Harbors to conduct the exit meeting with Mr. Martin and Mr. Key. David Nielsen, Director of Landfill Compliance, and Lon Stewart, Regulator Compliance Manager attended the exit meeting via telephone. I explained the violations and the corrective actions. Additionally, I discussed the following concerns and comments:

A. It is not appropriate to photocopy completed inspection logs or type in the time.
B. The inspection of tank V-17 was not always noted on the inspection log.
C. Initial all changes on the manifest.
D. Improve outside housekeeping.
E. Train Field Service employees on conducting inspections and manifesting requirements.

I left two Hazardous Waste Generator Handbooks with Mr. Martin.

6.0 SUMMARY OF VIOLATIONS:

Violation 1: Failure to determine if the liquid or the materials are hazardous.

(a) On the east side of building I we observed multiple 300-gallon totes. Refer to photograph 5. The majority of the totes were empty. However, there were three totes open and they each contained a small amount of liquid. The totes will be referred to as A, B, and C. Tote A is the blue rusting tote next to the wall of Building I. Refer to photographs 6 through 8. Tote B shown in photograph 9 is on the bottom and there are multiple old labels on the tote. Refer to photographs 9 through 11. Tote C is stacked on top of tote B. Refer to photograph 9. Mr. Martin informed us that the liquid in the totes was rain water, but he did not know if totes A, B, and C had been decontaminated prior to storage.

(b) On the east side of the processing area and outside the secondary containment we observed two 55-gallon drums sitting on a wood pallet. Refer to photographs 12 through 14. The drums had collected rain water. The yellow 55-gallon drum also contained equipment from the processing area. We observed a drum scraper inside the yellow drum that was covered with an unknown material. The black 55-gallon drum contained used absorbent pigs and booms. Mr. Martin could not tell us where or when these absorbent materials had been generated.

Violation 2: Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to the air, soil, or surface water which could threaten human health or the environment. *Refer to Permit Part I, Section II.A. (attachment 26)*

During the record review of the daily inspection logs we observed that a spill of hazardous waste had occurred on January 28, 2003 (attachment 6). The spill was noted on the daily inspection log dated January 29, 2003 (attachment 7). The spill was not noted on the daily inspection log dated January 30, 2003 (attachment 8). All of the inspection logs were signed by David Bernard, Fork Lift Driver. Mr. Martin was not aware that a spill had occurred. Currently, Mr. Bernard drives a truck for Clean Harbors. On September 23, 2003, Mr. Martin provided me with documentation signed by Mr. Bernard describing the spill and clean up of the spill (attachment 9), manifest 00251 (attachment 10), and material profile TU99-0236 (attachment 11). The material spilled was waste flammable liquid (aviation fuel, ethanol), D001, D007, D008, D021, D025, F003. The hazardous waste was not cleaned up immediately because equipment was not available to move the tanker. The spill was unattended for two days. Additionally, Mr. Bernard did not report the spill to his superiors or document the cleanup of the spill. This incident occurred the week Clean Harbors laid off most of the employees.

Violation 3: Failure to document the required information on 45 inspection logs. *Refer to Permit Part I, Section II.E. (attachment 26)*

(a) Failure to generate a remedial work order for remedy of deterioration or malfunction discovered by an inspection. This is referring to the hazardous waste spill for a tanker on January 28. Refer to attachments 6 through 8.

(b) Failure to document observations on five daily facility inspections logs dated October 3, 2002, December 3, 2002, December 31, 2002, February 7, 2003, and February 21, 2003. Refer to attachment 12.

(c) Failure to document the date on six logs (attachment 13); nine logs not signed (attachment 14); and no time documented on 24 logs (attachment 15).

Violation 4: Failure to provide hazardous waste training. *Refer to Permit Part I, Section II.F. (attachment 26)*

(a) Failure to provide annual hazardous waste training for all employees who handle hazardous waste. The last hazardous waste training occurred on July 22, 2002 when the facility was operated by Safety Kleen. Refer to attachment 16 for the training attendance /certification sheet.

(b) Failure to provide hazardous waste training for John Martin within six months of his new position. Mr. Martins previous title was Routing Supervisor, when the facility was owned and operated by Safety Kleen. Since Clean Harbors purchased the facility his title changed to Operations Manager and his responsibilities changed. Mr. Martin started his

new position with Clean Harbors on September 7, 2002 and he has not received any hazardous waste training since that date.

Violation 5: Failure to provide copies of the Contingency Plan to outside agencies. *Refer to Permit Part I, Section II.J.2. (attachment 26)*

Mr. Martin could not provide documentation that Clean Harbors had provided copies of the Contingency Plan to outside agencies.

Violation 5 was corrected during the inspection. Refer to attachment 17 for the notification letters to the outside agencies.

Violation 6: Failure to update the emergency coordinator documented in the Contingency Plan. *Refer to Permit Part I, Section II.J.3. (attachment 26)*

From September 6, 2002 through September 9, 2003 Mr. Key was listed as the primary emergency coordinator and Rusty Dunn were listed as the alternate coordinator in the Contingency Plan Table H-1. Refer to attachment 18. The Contingency Plan has not been updated since Mr. Dunn was laid off on January 31, 2003.

Violation 6 was corrected during the inspection. Refer to attachment 19.

Violation 7: Failure to have a trained emergency coordinator available at all times in case of an emergency. *Refer to Permit Part I, Section II.J.4. (attachment 26)*

From September 6, 2002 through September 9, 2003 Mr. Key was listed as the primary emergency coordinator and Rusty Dunn were listed as the alternate coordinator in the Contingency Plan Table H-1. Refer to attachment 18. Mr. Dunn was laid off on January 31, 2003 eliminating the alternate emergency coordinator for approximately seven months. Upon questioning Mr. Key, he informed us that because of his Field Service duties he is out of the state of Kansas approximately one day per week. I asked Mr. Key if he had formally designated an alternate emergency coordinator. He told us that he had not designated an alternate emergency coordinator.

Violation 8: Failure to comply with the following manifest requirements. *Refer to Permit Part I, Section II.K.3. (attachment 26)*

Manifests 00225 and 00247 contained no emergency contact telephone number.
Manifests 03143 and 03257 were not signed by the TSD representative.
Manifests 03143, 03257, and 03284 were not dated by the TSD representative.
Manifest 00260 the pick-up date was not documented by the transporter.
Refer to attachment 20 for all manifests listed above.

Violation 9: Failure to manage incompatible wastes in accordance with the procedures in Special Requirements for Incompatible Wastes. *Refer to Permit Part I, Section II.K. (attachment 26)*

During the record review of the daily inspection logs we observed that on December 7, 2002 drums containing acidic hazardous waste were stored on top of drums containing basic hazardous waste. Refer to attachment 21. Work order # 7802 was generated on 12/7/02. Refer to attachment 22. However, the problem was not corrected until 12/11/02.

Violation 10: Failure to properly handle a hazardous waste storage container that is not in good condition. *Refer to Permit Part I, Section III.C. (attachment 26)*

During the inspection of the Drum Dock Area we observed a dented black 55-gallon drum containing hazardous waste liquid (D005, D008, D009). The dent was located over the seam of the drum. Refer to photographs 2 through 4.

Violation 10 was corrected during the inspection. Mr. Martin overpacked the dented drum. No photograph was taken of the correction.

Violation 11: Failure to inspect tank V-1 on 11/2/02 and 11/3/02. *Refer to Permit Part I, Section IV.F.3. (attachment 26)*

On the daily inspection tank logs for November 2 and 3, 2002 the notation for tank V-1 was "out of service." Refer to attachment 23 and 24. However, the tank log book has a notation on November 1, 2002 that tank V-1 was in service. Refer to attachment 25. Additionally, Mr. Martin informed us that tank V-1 was not out of service until January 31, 2003.

Violation 12: *Refer to Permit Part I, Section I.E.6. (attachment 26)*

(a) Failure to maintain the roof on building D.
Inside building D we observed standing water on the floor under the horizontal tanks. Refer to photograph 1. The leaking roof was identified on multiple inspection logs between October 2002 through August 2003. Refer to attachments 3 through 5.

(b) Failure to provide adequate staffing for the TSD facility.
Mr. Martin is the only employee of this TSD facility. His job duties include loading and unloading trucks, creating, tracking and filing manifests, conducting analytical testing, and conducting the facility daily, weekly, and monthly inspections. The employees of Clean Harbors Field Services assume Mr. Martin's duties when he is not available. The number and type of violations and concerns observed during the inspection indicate additional dedicated staffing is necessary.

7.0 ATTACHMENTS:

1. Facility Site Map
2. Tank Location Map
3. Daily Inspection Log, 10/29/02
4. Daily Inspection Log, 1/25/03
5. Daily Inspection Log, 8/31/03
6. Daily Inspection Log, 1/28/03
7. Daily Inspection Log, 1/29/03
8. Daily Inspection Log, 1/30/03
9. Spill Documentation, 9/12/03
10. Manifest 00251
11. Material Profile TU99-0236
12. Daily Inspection Logs: 10/3/02, 12/3/02, 12/31/02, 2/7/03, 2/21/03
13. Inspection Logs: Not Dated
14. Inspection Logs: Not Signed
15. Inspection Logs: No Time
16. Training Attendance/Certification Sheet
17. Letters to Outside Agencies
18. Contingency Plan Emergency Coordinators Table H-1, 12/19/01
19. Contingency Plan Emergency Coordinators Table H-1, 9/9/03
20. Manifests: 00247, 03143, 03257, 03284, 00260
21. Daily Inspection Log, 12/7/02
22. Work Order #7802
23. Daily Inspection Tank Log, 11/2/02
24. Daily Inspection Tank Log, 11/3/02
25. Tank Log Book, 11/1/02
26. Hazardous Waste Management Facility Permit, Part I

8.0 APPENDIX

All photographs were taken by Debbie Travis with a Sony Mavica digital camera.

NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

RECEIVED
OCT 27 2003
BUREAU OF WASTE MANAGEMENT

Initial Inspection: (Yes) No Follow-up Inspection: Yes (No) Complaint: Yes (No)
Hazardous Waste: LDF ( ) TSF (X) GEN (X) KG ( ) SQ ( ) UNV ( ) NOT A GEN ( ) OTHER ( )
Used Oil: UOG ( ) UOT ( ) UOM ( ) UOP ( ) UOB ( )
Solid Waste: SLF ( ) TRS ( ) CDL ( ) ILF ( ) YWC ( ) SWP ( ) HHW ( ) OBS ( ) MTP ( ) WTM ( ) WTP ( ) WTR ( ) WTT ( )

TO: Clean Harbors Kansas, LLC (Facility Name) 9/23/03 (Date)

2549 N. New York (Address) Wichita (City) KS (State) 67219 (Zip Code) Sedgwick (County)

KSD007246846 (EPA Identification No.)

(Solid Waste Permit No.)

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

(X) Violations As Follows ☐ No Violations Identified

	Citation	Description of Violation
(1)	KAR 28-31-4(b)	Failure to determine if hazardous waste (a) three 300-gallon totes outside building I (b) two 55-gallon drums east of the processing area
(2)	Permit Part I, Section II. A., [40CFR 264.31]	Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (1/28/03 spillage from tanker)

(X) Other Comments/Concerns:

* Corrected during the inspection.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:
Debbie Travis
Kansas Department of Health and Environment
South Central District Office
Waste Management Program
130 S. Market, Suite 6050
Wichita, Kansas 67202-3802

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 337-6020 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by: Debbie Travis

Date 9/23/03

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: John R. Martin

Signature: John R Mt

Title: Operations Supervisor

Date 09/23/03

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NOTICE OF COMPLIANCE/NON-COMPLIANCE

CONTINUATION PAGE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

TO: Clean Harbors Kansas, LLC (Facility Name) 9/23/03 (Date)

This page is a continuation of the Notice of Compliance/Non-Compliance form.

	Citation	Description of Violation
(3)	Permit Part I, Section II. E, [40 CFR 264.15]	(a) Failure to document (RWO) remedy of deterioration or malfunction discovered by an inspection (1/28/03 tanker spill) (b) Failure to document observations on 5 inspection logs (c) Failure to document the required information on the daily, weekly, monthly facility inspection logs (6 not dated, 9 not signed, & 24 with no time noted)
(4)	Permit Part I, Section II. F [40 CFR 264.16]	(a) Failure to provide annual hazardous waste training for all employees (b) Failure to provide hazardous waste training for John Martin within 6 months of a new position.
*(5)	Permit Part I, Section II. J.2 [40 CFR 264.53]	Failure to provide copies of the Contingency Plan to outside agencies
*(6)	Permit Part I, Section II. J.3 [40 CFR 264.54]	Failure to update the emergency coordinator documented in the Contingency Plan
(7)	Permit Part I, Section II. J.4 [40 CFR 264.55]	Failure to have a trained emergency coordinator available at all times in case of an emergency.

Other Comments/Concerns:

Initials of person preparing this form: dt
Date 9/23/03

Initials of person receiving this form: JM
Date 09/23/03

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NOTICE OF COMPLIANCE/NON-COMPLIANCE

CONTINUATION PAGE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management Program

TO: Clean Harbors Kansas, LLC (Facility Name) 9/23/03 (Date)

This page is a continuation of the Notice of Compliance/Non-Compliance form.

	Citation	Description of Violation
(8)	Permit Part I Section II.K.3, [40CFR 264.71]	Failure to comply with the manifest requirements. 2 manifest (00225, 00247) had no emergency contact number. 2 manifest (03143, 03257) were not signed by the TSD. 3 manifest (03143, 03257, 03284) were not dated by the TSD. 1 manifest (00260) the transporter did not note the pick-up date.
(9)	Permit Part I, Section III.K., [40CFR 264.~~13~~ 71]	Failure to manage incompatible waste in accordance with the proceduces in Special Requirements for Incompatible Wastes. (12/7/02 dt building B storage of acid + base drums)
* (10)	Permit Part I, Section III.C. [40CFR 264.171]	Failure to properly handle a hazardous waste storage container (55-gallon drum) that is not in good condition.
(11)	Permit Part I, Section III.F.3., [40CFR 264.195(b)]	Failure to inspect tank V-1 on 11/2/02 + 11/3/02
(12)	Permit Part I, Section I.E.6., [40CFR 270.30(e)]	(a) Failure to maintain the roof of building O. (b) Failure to provide adequate staffing for the TSD

Other Comments/Concerns:

Each of the above permit violations is also a violation of KSA 65-3441(a)(3).

(A) Inspection Logs: don't photo copy completed log or type the time
(B) Tank 17 is inspected only part of the time.
(C) Manifest: Initial all changes
(D) Improve outside housekeeping
(E) Train Field Service employees on conducting inspections and manifesting requirements.

Initials of person preparing this form: dt
Date 9/23/03

Initials of person receiving this form: JM
Date 09/23/03

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KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

COMPLIANCE INSPECTION CHECKLIST COVER PAGE

General ☒ Routine ☐ Complaint

EPA/ ID/Permit No. KSD 007 246 846 Time 9:00 a.m. Date Sept. 9, 10, & 23, 2003

Facility Name Clean Harbors Kansas, LLC District SCDO

Street 2549 N. New York City Wichita ,KS ZIP 67219

Mailing Address (if different than above) P.O. Box 1875

County Sedgwick Number of Employees 1

Phone 316-269-7400 Fax 316-269-7455 e-mail martin.john@cleanharbors.com

Contact(s) John Martin, Operations Manager Inspector(s) Debbie Travis

Type of Business Storage and Transfer Facility

Operating Hours and days 8:00 a.m. to 5:00 p.m., Monday through Friday

Lat/Long Location Method: Garmin Lat/Long Location Feature: Entrance

Latitude: (like 37.57621) N 37.72894° Lontitude: (like-101.57621) W 97.31817°

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection: ☒ Yes ☐ No

Generator size classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☒ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: ☒ T/S/D Facility ☐ Used Oil Activities
(complete applicable checklist) ☐ Tanks ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? NO
If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☐ Yes ☒ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☐ No
If yes, then the facility is subject to SPCC requirements due to Used Oil activities.

Facility Used Oil Activities (Attach a checklist for each one marked):

☐ Generator
☐ Transporter / Transfer Facility
☐ Used Oil Burner (Off-Spec Fuel)
☐ Collection Center / Aggregation Point
☐ Used Oil Processor / Re-Refiner
☐ Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR
COMPLIANCE INSPECTION CHECKLIST

Industrial Wastes Generated

(List all solid and hazardous wastes. List hazardous wastes first)

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods
Flammable Solids (PPE, floor debris, damaged containers, and spill clean-up)	D001, D018, D035, F003, F005	10 P	none	n/a	Clean Harbors, Kimball, NE
Flammable Liquids (lab samples)	D001, D018, D035, F002, F003, F005	10 gallons	none	n/a	Clean Harbors, Kimball, NE

General Requirements (GGR)

	YES	NO	NA	V#
1. Has the generator evaluated each potentially hazardous waste(s) to determine if it is hazardous? **KAR 28-31-4(b)**	☐	☒		1
a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? **KAR 28-31-4(b)(3)(A)**	☒	☐	☐	
b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? **KAR 28-31-4(f)(1)(C)**	☒	☐	☐	
c. If waste was not tested, did the generator use process knowledge? **KAR 28-31-4(b)**	☒	☐	☐	
2. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW?	☐	☐	☒	
3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each subject waste? **KAR 28-29-109(c)**	☐	☐	☒	
a. List the SWDA authorization number(s): _____				
4. If the generator recycles hazardous waste on-site (such as in a still), do they count waste each time prior to its being recycled? **KAR 28-31-4(o)**	☐	☐	☒	
If the waste is not counted, is it exempt because of a closed loop system? **KAR 28-31-4(o)**	☐	☐		

General Requirements: ☐ Compliance ☒ Non-Compliance ☐ NA

Notification Requirements (GGR)

5. Has generator notified KDHE and obtained an EPA Identification Number? **KAR 28-31-4(c)(1)**	☒	☐	
6. Is current notification accurate? **KAR 28-31-4(c)(1)**	☒	☐	☐

Notification Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Storage Requirements (GPT)

	YES	NO	NA	V#
11. If generator temporarily stores waste in containers,				
a. Is each container clearly marked with the words "Hazardous Waste"? **KAR 28-31-4(g)(3) or KAR 28-31-4(h)(4) or KAR 28-31-4(m)(2)(B)**	☒	☐		
b. Is the accumulation start date marked on each container? **KAR 28-31-4(g)(2) or KAR 28-31-4(h)(3) or KAR 28-31-4(m)(2)(B)**	☒	☐		
c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)**	☒	☐		
d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)**	☒	☐		
A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? **KAR 28-31-4(k)**	☐	☒	3	
12. If SQG or Kansas generator is accumulating 2,200 lbs (1,000 kg) or more of hazardous waste (or 2.2 lbs (1 kg) or more of acutely hazardous waste), then check yes and continue with EPA generator requirements.	☐		☒	

Storage Requirements: ☐ Compliance ☒ Non-Compliance ☐ NA

(Small quantity generator accumulating <1,000 Kilograms stop here)

Storage Requirements for Kansas and EPA Generators (GPT)

		YES	NO	NA	V#
13.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A)**	☒	☐	☐	
14.	Is EPA generator storing hazardous waste for 90 days or less? **KAR 28-31-4(g)**	☒	☐	☐	
15.	Are containers holding ignitible or reactive waste(s) located at least 15 meters (50 feet) from the generator's property line? (EPA Generator Only) **KAR 28-31-4(g)(1)(A)**	☒	☐	☐	

(If waste(s) is placed in tanks complete the appropriate inspection checklist.)

Storage Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Satellite Accumulation Requirements for Kansas and EPA Generators (GPT)

16. If the Kansas or EPA generator has satellite accumulation areas,

a.	Is 55-gallons or less of each waste stream accumulated at or near the point of generation, in one container, which is under the control of the operator of the process generating that waste? **KAR 28-31-4(j)(1)**	☒	☐		
b.	Is each container in good condition and closed except to add or remove waste? **KAR 28-31-4(j)(1)(A)**	☒	☐		
c.	Is each container marked with the words "Hazardous Waste"? **KAR 28-31-4(j)(1)(B)**	☒	☐		
d.	Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? **KAR 28-31-4(j)(2)**	☐	☐	☒	
e.	Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? **KAR 28-31-4(j)(2)**	☐	☐	☒	

Satellite Accumulation Requirements: ☒ Compliance ☐ Non-Compliance NA

Manifests (GMR)

	YES	NO	NA	V#
17. If a contractual agreement is used in place of manifesting? (Kansas Generators only)				
a. Does the contractual agreement include the type of waste and frequency of shipments? **KAR 28-31-4(d)(7)(A)**	☐	☐	☒	
b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? **KAR 28-31-4(d)(7)(B)**	☐	☐	☒	
c. Is a copy of the agreement kept for a period of three years after termination of agreement? **KAR 28-31-4(d)(7)(C)**	☐	☐	☒	
18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1)**	☐	☐	☒	
a. If yes, does each manifest include:				
1. Generator EPA identification number (12 digit) and unique manifest document number (five digit)? **KAR 28-31-4(d)(1)**	☒	☐		
2. Number of pages? **KAR 28-31-4(d)(1)**	☒	☐		
3. Generator's name and mailing address? **KAR 28-31-4(d)(1)**	☒	☐		
4. Generator's phone number? **KAR 28-31-4(d)(1)**	☒	☐		
5. Each transporter's name? **KAR 28-31-4(d)(1)**	☒	☐		
6. Each transporter's EPA identification number? **KAR 28-31-4(d)(1)**	☒	☐		
7. Name and site address of designated facility? **KAR 28-31-4(d)(1)(A)**	☒	☐		
8. Designated facility's EPA identification number? **KAR 28-31-4(d)(1)**	☒	☐		
9. Waste description (DOT shipping name, hazard class, packing group and identification number)?**KAR 28-31-4(d)(1)**	☒	☐		
i. If applicable, are the requirements of 49 CFR 172.203(k) met? **KAR 28-31-4(d)(1)**	☒	☐	☐	
10. Number and type of containers? **KAR 28-31-4(d)(1)**	☒	☐		
11. Total quantity? **KAR 28-31-4(d)(1)**	☒	☐		
12. Unit (weight or volume)? **KAR 28-31-4(d)(1)**	☒	☐		
13. Special handling instructions (if applicable)? **KAR 28-31-4(d)(1)**	☒	☐		
14. Generator's certification including waste minimization statement, generator's signature and date? **KAR 28-31-4(d)(4)(A)**	☒	☐		
15. Name, signature, and date of initial transporter? **KAR 28-31-4(d)(4)(B)**	☒	☐		
b. Does generator retain a copy of each manifest signed and dated by both generator and transporter? **KAR 28-31-4(d)(4)(B) and/or KAR 28-31-4(d)(4)(C)**	☒	☐	☐	
c. Does generator retain a copy of each manifest(s) signed and dated by T/S/D facility owner/operator for three years? **KAR 28-31-4(f)(1)(A)**	☒	☐	☐	
d. If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? **KAR 28-31-4(f)(4)(B)**	☐	☐	☒	
1. If yes, was copy retained for three years? **KAR 28-31-4(f)(1)(B)**	☐	☐	☒	

Manifesting Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Land Disposal Restriction Requirements (GLB)

		YES	NO	NA	V#
19.	If the generator's waste is **not** subject to the Land Disposal Restrictions regulations, please explain why: _____				
20.	If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **40 CFR 268.7(a)(2)**	☒	☐	☐	
	a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **40 CFR 268.7(a)(2)**	☒	☐	☐	
21.	If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **40 CFR 268.7(a)(3)**	☐	☐	☒	
	a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **40 CFR 268.7(a)(2)**	☐	☐	☒	
22.	If the generator treated waste in tanks or containers to meet applicable treatment standards:				
	a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **40 CFR 268.7(a)(5)**	☐	☐	☒	
	b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? **40 CFR 268.7(a)(5)(iii)**	☐	☐	☒	
23.	Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? **40 CFR 268.7(a)(8)**	☒	☐	☐	
24.	If the generator claims that his characteristic waste is no longer hazardous:				
	a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? **40 CFR 268.9(d)**	☐	☐	☒	
	b. Is the information on the notice and certification current?**40 CFR 268.9(d)**	☐	☐	☒	

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR Requirements:	☒ **Compliance**	☐ **Non-Compliance**	☐ **NA**

Special Conditions (GSC)

	YES	NO	NA	V#
25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?	☐	☐	☒	

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

Special Conditions Requirements: ☐ Compliance ☐ Non-Compliance ☒ NA

Kansas Generator's Emergency Preparedness (GPT)

26. Has generator designated one employee as emergency coordinator? **KAR 28-31-4(h)(6)**	☐	☐	
a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6)**	☐	☐	
b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9)**	☐	☐	
27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7)**			
a. Name and telephone number of the emergency coordinator(s)? **KAR 28-31-4(h)(7)(A)**	☐	☐	
b. Location of fire extinguishers and spill-control material and if available fire alarms? **KAR 28-31-4(h)(7)(B)**	☐	☐	
c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C)**	☐	☐	
28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8)**	☐	☐	

KS Gen.'s Emergency Preparedness Requirements: ☐ Compliance ☐ Non-Compliance ☒ NA

Hazardous Waste Reporting (GRR)

29. Has Kansas or EPA generator submitted an annual monitoring fee and report to KDHE? **KAR 28-31-10(g)(1) or KAR 28-31-10(g)(3)**	☒	☐	
30. Has EPA generator submitted a biennial report(s) to KDHE? **KAR 28-31-4(f)(2)(A)**	☒	☐	☐
a. Does generator retain a copy of the report for three years? **KAR 28-31-4(f)(1)(B)**	☒	☐	☐

Hazardous Waste Reporting Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

Preparedness and Prevention (GPT)

		YES	NO	NA	V#
31.	Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? **40 CFR 265.31**	☐	☒	☐	9
32.	**If appropriate**, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:				
	a. Internal communication or alarm system easily accessible in case of emergency? **40 CFR 265.32(a)**	☒	☐	☐	
	b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? **40 CFR 265.32(b)**	☒	☐	☐	
	c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? **40 CFR 265.32(c)**	☒	☐	☐	
	d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? **40 CFR 265.32(d)**	☒	☐	☐	
	e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? **40 CFR 265.33**	☒	☐	☐	
33.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? **40 CFR 265.35**	☒	☐	☐	
34.	**If appropriate**, for the type(s) of waste handled, has the generator made the following arrangements:				
	a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? **40 CFR 265.37(a)(1)**	☒	☐	☐	
	b. Designated one authority where one or more police or fire departments might respond to an emergency? **40 CFR 265.37(a)(2)**	☒	☐	☐	
	c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? **40 CFR 265.37(a)(3)**	☒	☐	☐	
	d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. **40 CFR 265.37(a)(4)**	☒	☐	☐	
35.	Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? **40 CFR 265.34**	☒	☐	☐	
36.	In cases where local authorities decline to enter into such arrangements, is the refusal documented? **40 CFR 265.37(b)**	☐	☐	☒	

Preparedness and Prevention Requirements: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

(If Kansas generator, stop here)

Personnel Training (GPT)

		YES	NO	NA	V#
37.	Has the generator established a hazardous waste management training program? **40 CFR 265.16(a)(1)**	☒	☐		
a.	Is the program directed by a person trained in hazardous waste management? **40 CFR 265.16(a)(2)**	☒	☐		
b.	Are new personnel trained within six months after their employment or placement to a new position? **40 CFR 265.16(b)**	☐	☒		4
c.	Are new employees supervised until training is completed? **40 CFR 265.16(b)**	☐	☒		4
d.	After initial training, are employees trained on an annual basis? **40 CFR 265.16(c)**	☐	☒		4
e.	Does the generator maintain the following documents and records:				
1.	Job title for each position related to hazardous waste management and the name of the employee filling each job? **40 CFR 265.16(d)(1)**	☒	☐		
2.	Written job description for each position? **40 CFR 265.16(d)(2)**	☒	☐		
3.	Description of type and amount of both introductory and continuing training to be given each person? **40 CFR 265.16(d)(3)**	☒	☐		
4.	Records of training given to facility personnel? **40 CFR 265.16(d)(4)**	☒	☐		
5.	Are training records kept on all current and past employees? **40 CFR 265.16(e)**	☒	☐		

Personnel Training Requirements: ☐ Compliance ☒ Non-Compliance ☐ NA

Contingency Plan (GPT)

		YES	NO	NA	V#
38.	Does the generator have a contingency plan? **40 CFR 265.51(a)**	☒	☐		
	If yes,				
a.	Does the plan list the name(s), home address, and phone number (home and office) of each designated emergency coordinator in the order in which they should be contacted? **40 CFR 265.52(d)**	☐	☒		6
b.	Is an emergency coordinator available at all times? **40 CFR 265.55**	☐	☒		7
c.	Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? **40 CFR 265.52(a)**	☒	☐		
d.	Does the plan describe arrangements made with emergency response agencies? **40 CFR 265.52(c)**	☒	☐		
e.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? **40 CFR 265.52(e)**	☒	☐		
f.	Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? **40 CFR 265.52(f)**	☒	☐		
g.	Have copies of the plan been provided to outside emergency response agencies and hospitals? **40 CFR 265.53(b)**	☐	☒		5
h.	If implementation of the plan has been required at the facility, was the generator required to submit a written report on the incident to the KDHE? **40 CFR 265.56(j)**	☐	☐	☒	
1.	If yes, was the written report submitted? **40 CFR 265.56(j)**	☐	☐	☒	

Contingency Plan Requirements: ☐ Compliance ☒ Non-Compliance ☐ NA

(if EPA generator, stop here.)

V# = Violation Number

Additional Information and Conclusions:

Other items:

HAZARDOUS WASTE TRANSPORTER COMPLIANCE INSPECTION CHECKLIST

Transporter Requirements (TRR)

1.	Are they registered as a hazardous waste transporter with KDHE? **KAR 28-31-6 (b)**	☒	☐	
2.	Does transporter comply with the manifest requirements of 40 CFR Part 263.20 except 263.20(h)? **KAR 28-31-6(a)**	☒	☐	
3.	Does transporter retain a copy of the manifest for three years? **KAR 28-31-6(a)**	☒	☐	
4.	If they transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7), does the transporter record the following on a log or shipping paper:			
	a. The name, address, and EPA ID Number of the generator; **KAR 28-31-6(e)(2)(A)**	☐	☐	☒
	b. Quantity of waste shipped? **KAR 28-31-6(e)(2)(B)**	☐	☐	☒
	c. DOT shipping information? **KAR 28-31-6(e)(2)(C)**	☐	☐	☒
	d Date the waste was accepted? **KAR 28-31-6(e)(2)(D)**	☐	☐	☒
	e Does the transporter carry this record when transporting the waste to the reclamation facility? **KAR 28-31-6(e)(3)**	☐	☐	☒
	f Does the transporter retain this record for a period of three years after termination or expiration of the agreement? **KAR 28-31-6(e)(4)**	☐	☐	☒

Transporter Requirements: ☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

TRANSPORTER10-25-02.wpd: Generator Checklist Revised October 25, 2002

Additional Information and Conclusions:

Other items:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE T/S/D FACILITY COMPLIANCE INSPECTION CHECKLIST

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

General

EPA ID KSD 007 246 846 Time 9:00 a.m. Date Sept. 9, 10, & 23, 2003

Facility Name Clean Harbors Kansas, LLC District SCDO

Street 2549 N. New York City Wichita Kansas Zip 67219

Mailing Address (if different than above) P.O.Box 1875

County Sedgwick Phone 316 269-7400

Contact(s) John Martin, Operations Manager

Inspector(s) Debbie Travis SIC:

Type of Business Hazardous Waste Storage and Transfer Facility Number of Employees 1

Has the company declared any information/process as trade secrets (KSA 65-3447)? NO
If yes, explain:

Activity at Site

Treatment

[ ] Chem/Phys/Bio Treatment
[ ] Containment Building
[ ] Filtration
[ ] Incineration
[ ] Recycling/Recovery
[ ] Reprocessing
[ ] Thermal Treatment
[ ] Volume Reduction
[ ] Other

Storage

[ ] Containment Building
[X] Drums
[ ] Pile
[ ] Surface Impoundment
[X] Tank(s) (complete applicable checklist)
[X] Other

Disposal

[ ] Deep Well Injection
[ ] Incineration
[ ] Landfill
[ ] Land Treatment
[ ] Surface Impoundment
[ ] Other

Comments:

Waste Analysis Plan (DGS)

	YES	NO	NA
1 Does facility maintain a copy of its waste analysis plan at the facility? [264.13(b)/265.13(b)]	[X]	[ ]	[ ]
a. If yes, does the plan include:			
A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)1)]	[X]	[ ]	
B. Test methods which are used to test for these parameters? [264.13(b)(2)/265.13(b)(2)]	[X]	[ ]	
C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)]	[X]	[ ]	
D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)]	[X]	[ ]	
E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)]	[X]	[ ]	[ ]
F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest? [264.13(c)/265.13(c)]	[X]	[ ]	[ ]

Waste Analysis Plan Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Security (DGS)

2 Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)?	[ ]	[X]	
If no,			
a. Does the facility provide either of the following:			
A. A 24-hour surveillance system (TV monitoring or guards)? [264.14(b)(1)/265.14(b)(1)]; OR	[ ]	[X]	[ ]
B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)]	[X]	[ ]	[ ]
b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)]	[X]	[ ]	

Security Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

General Inspection Requirements (DGS)

3 Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)]	[X]	[ ]	
4 Does the owner/operator keep the written inspection schedule at the facility? [264.15(b)(2)/265.15(b)(2)]	[X]	[ ]	
5 Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)]	[X]	[ ]	
6 Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)]	[ ]	[X]	3

	YES	NO	NA
7 Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)]	[ ]	[X]	3

Inspection Requirements: [ ] Compliance [X] Non-Compliance [ ] N/A

Personnel Training (DGS)

		YES	NO	
8	Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]			
a.	Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)]	[X]	[ ]	
b.	Written job description for each position? [264.16(d)(2)/265.16(d)(2)]	[X]	[ ]	
c.	Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)]	[X]	[ ]	
d.	Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)]	[X]	[ ]	

Personnel Training Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

		YES	NO	
9	Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)]	[X]	[ ]	
	If yes,			
a.	Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)]	[ ]	[X]	9
b.	Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)]	[X]	[ ]	
c.	Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)]	[X]	[ ]	
d.	Does a check of the areas used to handle ignitable or reactive wastes show:			
	A. Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)]	[ ]	[X]	
	B. Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)]	[ ]	[X]	
	C. Evidence of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)]	[ ]	[X]	
	D. Evidence of any leakage from or corrosion of containers? [264.17(b)(4)/265.17(b)(4)]	[ ]	[X]	

10	For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)]	[X]	[ ]	[ ]

Ignitable, Reactive, or Incompatible Waste Contingency Plan Requirements: [ ] Compliance [X]Non-Compliance [ ] N/A

Preparedness and Prevention (DPP)

11	Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31]	[ ]	[X]	

	YES	NO	NA
12 If applicable to the facility, is the facility equipped with:			
a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)]	[X]	[ ]	[ ]
b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)]	[X]	[ ]	[ ]
c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)]	[X]	[ ]	[ ]
d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)]	[X]	[ ]	[ ]
13 Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33]	[X]	[ ]	[ ]
14 Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:			
a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)]	[X]	[ ]	
b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)]	[X]	[ ]	[ ]
15 Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35]	[X]	[ ]	[ ]
16 As appropriate for the type(s) of waste handled, has the owner/operator:			
a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)]	[X]	[ ]	
b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)]	[X]	[ ]	[ ]
c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)]	[X]	[ ]	[ ]
d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)]	[X]	[ ]	
17 In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)]	[ ]	[ ]	[X]

Preparedness and Prevention Requirements:	[X] Compliance	[ ] Non-Compliance	[ ] N/A

Contingency Plan and Emergency Procedures (DCP)

18 Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)]	[ ]	[X]	5
a. If yes, does the plan:			
A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)]	[X]	[ ]	

Non-Accumulating Small Quantity Generator

	YES	NO	NA	V#
7. If the SQG is accumulating less than 25 kg of hazardous waste on-site,				
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2)**	☐	☐	☐	
b. Is the SQG sending this waste off-site for treatment, storage, or disposal? **KAR 28-31-4(m)(2)**	☐	☐	☐	

Non-Accumulating SQG Requirements: ☐ Compliance ☐ Non-Compliance ☒ NA

(small quantity generator not accumulating, stop here)

Accumulating Small Quantity Generator

8. If the SQG is accumulating 25 kg or more of hazardous waste,				
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2)**	☐	☐	☐	
b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? **KAR 28-31-4(m)(2)**	☐	☐	☐	

Accumulating SQG Requirements: ☐ Compliance ☐ Non-Compliance ☒ NA

Pre-Transport Requirements (GPT)

9. Does generator package, label (flammable liquid, poison, etc.), and mark (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? **KAR 28-31-4(e)**	☒	☐		
a. Does generator mark each container of 110 gallons or less as below? **KAR 28-31-4(e)(3)(B)**	☒	☐	☐	

Hazardous Waste-Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the US EPA.
Generator's Name and Address
Manifest Document Number

10. Does generator only use a transporter who has registered with the department and obtained an EPA Identification Number? **KAR 28-31-4(c)(2)**	☒	☐		

Pre-Transport Requirements: ☒ Compliance ☐ Non-Compliance ☐ NA

	YES	NO	NA
B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)]	[X]	[ ]	
C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)]	[ ]	[X]	6
D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)]	[X]	[ ]	
E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)]	[X]	[ ]	
19 Is an emergency coordinator available at all times? [264.55/265.55]	[ ]	[X]	7
20 Has implementation of the plan been required at the facility?	[ ]	[X]	
a. If yes, was the facility required to submit a written report on the incident to the KDHE?	[ ]	[ ]	
A. If yes, was the written report submitted? [264.56(j)/265.56(j)]	[ ]	[ ]	

Contingency Plan and Emergency Procedures Requirements: [ ] Compliance [X] Non-Compliance [ ] N/A

Manifest System, Recordkeeping, and Reporting (DMR)

21 Does the facility receive waste from off-site? [264.71/265.71]	[X]	[ ]	
a. If yes, does the owner/operator:			
A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)]	[ ]	[X]	8
B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)]	[ ]	[X]	8
C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)]	[ ]	[X]	8
D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)]	[X]	[ ]	
E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)]	[X]	[ ]	
22 Does the facility receive any waste from a rail or water (bulk shipment transporter?	[ ]	[X]	
a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)]	[ ]	[ ]	
If yes, does the owner/operator:			
A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)]	[ ]	[ ]	
B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)]	[ ]	[ ]	
C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)]	[ ]	[ ]	
D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)]	[ ]	[ ]	
C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)]	[ ]	[ ]	
23 Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72]	[X]	[ ]	
a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)]	[X]	[ ]	

	YES	NO	NA
A. If the discrepancy was not reconciled within 15 days, did the owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)]	[ ]	[ ]	X
24 Does the owner/operator keep a written operating record at the facility? [264.73(a)/265.73(a)]	[X]	[ ]	
a. If yes, does the operating record include:			
A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)]	[X]	[ ]	
B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)]	[X]	[ ]	
C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)]	[X]	[ ]	
D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)]	[X]	[ ]	
E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)]	[X]	[ ]	
F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)]	[X]	[ ]	
G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)]	[X]	[ ]	
H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)]	[X]	[ ]	
I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)]	[X]	[ ]	
J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)]	[X]	[ ]	[ ]
25 Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75]	[X]	[ ]	
a. If yes, does the report include:			
A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)]	[X]	[ ]	
B. The calendar year covered by the report? [264.75(b)/265.75(b)]	[X]	[ ]	
C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[ ]	
D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)]	[X]	[ ]	
E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)]	[X]	[ ]	
b. If yes and the facility receives waste from off-site facilities, does the report include:			
A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)]	[X]	[ ]	[ ]
B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[ ]	[ ]
c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators?	[ ]	[ ]	[X]
d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:			
A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)]	[ ]	[ ]	[X]
B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)]		[ ]	

	YES	NO	NA
26 Has the facility accepted any waste not accompanied by a manifest or shipping papers?	[ ]	[X]	
a. If yes, was the shipment excluded from manifest/shipping paper requirements?			
A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76]	[ ]	[ ]	

Manifest System, Recordkeeping and Reporting Requirements: [ ] Compliance [X] Non-Compliance [ ] N/A

Closure and Post-Closure (DCL)

27 Does the owner/operator have a written closure plan for the facility? [264.112(a)/265.112(a)]	[X]	[ ]	
a. If yes, does the plan include:			
A. A description of how and when the facility will be closed? [265.112(b)/265.112(b)]	[X]	[ ]	
B. A description of the steps necessary to completely close the facility? [264.112(b)(2)/265.112(b)(2)]	[X]	[ ]	
C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)]	[X]	[ ]	
D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)]	[X]	[ ]	
E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)]	[X]	[ ]	
F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)]	[X]	[ ]	
28 Is the facility a disposal facility?	[ ]	[X]	
a. If yes, does the owner/operator have a written post-closure plan? [264.118(a)/265.118(a)]	[ ]	[ ]	
If yes, does the plan include:			
A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)]	[ ]	[ ]	
B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? [264.118(c)(2)/265.118(c)(2)]	[ ]	[ ]	
C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)]	[ ]	[ ]	

Closure and Post-closure Requirements: [X] Compliance [ ] Non-Compliance [ ] N/A

Financial Requirements (DFR)

29 Does the owner/operator have a written estimate of the closure cost? [264.142(a)/265.142(a)]	[X]	[ ]	
30 Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143]	[X]	[ ]	

	YES	NO	NA
31 Is the facility a disposal facility?	[ ]	[X]	
a. If yes, has the owner/operator:			
A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)]	[ ]	[ ]	
B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145]	[ ]	[ ]	
C. Obtained liability insurance for nonsudden and accident occurrences of at least $3 million per occurrence with an annual aggregate of at least $6 million exclusive of legal defense costs? [264.147(b)/265.147(b)]	[ ]	[ ]	
32 Has the owner/operator obtained liability insurance for sudden occurrences of at least $1 million with an aggregate of at least $2 million exclusive of legal defense costs? [264.147(a)/265.147(a)]	[X]	[ ]	

Financial Requirements:	**[X] Compliance**	**[ ] Non-Compliance**	**[ ] N/A**
Management of Containers (DMC)			

33 Are containers presently used to store hazardous waste?		[X]	[ ]	
If yes,				
a.	Are the containers in good condition? [264.171/265.171]	[ ]	[X]	**10**
b.	Are the containers compatible with the waste? [264.172/265.172]	[X]	[ ]	
c.	Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173]	[X]	[ ]	
d.	Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174]	[X]	[ ]	
e.	Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174]	[X]	[ ]	
If yes,				
A.	Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)]	[X]	[ ]	
B.	Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)]	[X]	[ ]	
C.	Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)]	[X]	[ ]	
D.	Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)]	[X]	[ ]	
E.	Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)]	[X]	[ ]	
f.	Does the storage area store containers holding only wastes that do not contain free liquids?	[ ]	[X]	
If yes,				
A.	Are the containment system requirements of 264.175(b)/265.175(b) met?	[ ]	[ ]	
If no,				
i.	Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR	[X]	[ ]	
ii.	Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)]	[X]	[ ]	

		YES	NO	NA
g.	Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176]	[X]	[ ]	
h.	If waste in containers is incompatible with other materials stored nearby, in other containers, piles. open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)]	[X]	[ ]	

Management of Containers [ ] Compliance [X] Non-Compliance [ ] N/A

TSDLIST: TSD Checklist Revised 9/98

Additional Information and Conclusions:

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT
1000 SW Jackson, Suite 320
Topeka, Kansas 66612-1366

TANK INSPECTION CHECKLIST
for
EPA and KANSAS GENERATORS

General Tank Information

__X_ EPA Generator ____ Kansas Generator

Tank Number or Name:	V-1	V-2 through V-8, V17 & V-26 (9 tanks)	V-9 through V-16 (11 tanks)
Capacity: (gallons)	7,363	522 to 20,895	2,659 to 9,028
Substance Stored:	10-8-02 to 1-31-03 waste oil; currently not in use	none Empty since fall 1999	none Empty since fall 1999
Waste Code:	D008	n/a	n/a
Location:	Processing Area	Processing Area	Building D
Type: steel, fiberglass, etc.	steel	steel	steel
Vertical or horizontal:	vertical	vertical	horizontal
Type of tank roof:	closed	closed	closed

Applicability 40 CFR 265.190

1. The following tank systems are exempt from 40 CFR 265 Subpart J:
   - (a) Tank systems that are an integral component of a recycling unit.
   - (b) Tank systems that meet the definition of a totally enclosed treatment unit.
   - (c) Tank systems that meet the definition of an elementary neutralization unit.
   - (d) Tank systems that are used **exclusively** for hazardous waste water treatment under the Clean Water Act.
   - (e) Tank systems that store or treat hazardous waste that contain no free liquids and are located inside a building with an impervious floor are exempt from secondary containment requirements only.
   - (f) Tank systems, including sumps, that serve as part of a secondary containment system.

(For Kansas Generator, begin on page 8, Question 31)

Existing Tank Systems Requirements - EPA Generator 40 CFR 265.191

			YES	NO
2.	(a)	Is the tank system an existing system, i.e., used for the management of hazardous waste prior to July 14, 1986? If no, skip to 2c.	[ ]	[X]
	(b)	Does the tank system have secondary containment? If yes, skip to Question 13 and evaluate containment. If no, skip to 2h.	[ ]	[ ] n/a
	(c)	Did the generator's waste become a hazardous waste after July 14, 1986?	[ ]	X
	(d)	Is the tank system required to have secondary containment under 40 CFR 265.193(a)(5)? If no, skip to 2f.	[X]	[ ]
	(e)	Does the tank system have secondary containment? If yes, skip to Question 3 and evaluate containment as a new tank component. If no, skip to 2i.	[X]	[ ]
	(f)	Did the generator obtain and keep on file at the facility a written assessment reviewed and certified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d), that attests to the tanks system's integrity within 12 months after the date the waste became a hazardous waste? **40 CFR 265.191(a)** If no, skip to 2i.	[ ]	[ ] n/a
		(A) At a minimum, did the assessment consider the following: **40 CFR 265.191(b)**		
		(i) Design standards of the tank and ancillary equipment?	[ ]	[ ]
		(ii) Hazardous characteristics of the waste?	[ ]	[ ]
		(iii) Existing corrosion protection?	[ ]	[ ]
		(iv) Documented age of the tank system, if available ?	[ ]	[ ]
		(v) Results of a leak test, internal inspection, or other tanks integrity examination per 40 CFR 265.191(b)(i) or (ii)?	[ ]	[ ]
	(g)	If the assessment found the tank was leaking or unfit for use, did the generator comply with 40 CFR 265.196? **40 CFR 265.191(d)** If yes, skip to Question 13. If no, skip to 2i.	[ ]	[ ] n/a
	(h)	Does the generator have a variance? If yes, review variance and skip to Question 15.	[ ]	[ ] n/a
	(i)	The tank system must be emptied and taken out-of-service until secondary containment or a variance is provided. **K.S.A. 65-3441(a)(4)** **STOP**		

Existing Tank System	[X] Compliance	[ ] Non-Compliance	[ ] NA

New Tank System Requirements - EPA Generator 40 CFR 265.192

		YES	NO
	Generators using new tank systems or adding new components must ensure that the foundations, structural supports, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste to be stored or treated, and corrosion protection so that the it will not collapse, rupture, or fail.		
3.	Has the generator obtained a written assessment reviewed by an independent, qualified, registered professional engineer, who certified in accordance with 40 CFR 270.11(d), attesting to the systems design? **40 CFR 265.192(a)**	[X]	[ ]
4.	Did the assessment include, at a minimum, the following information: **40 CFR 265.192(a)**		
	(a) Design standards for each tank and its ancillary equipment?	[X]	[ ]
	(b) Hazardous characteristics of the waste to be handled?	[X]	[ ]
	(c) For an external metal tank shell or metal tank components that will contact soil or water, a determination by a corrosion expert of:		
	A. Corrosion factors:		
	(i) Soil moisture?	[ ]	[ ]N/A
	(ii) Soil pH?	[ ]	[ ]N/A
	(iii) Soil sulfide level?	[ ]	[ ]N/A
	(iv) Soil resistivity?	[ ]	[ ]N/A
	(v) Structure to soil potential?	[ ]	[ ]N/A
	(vi) Influence of nearby underground metal structures?	[ ]	[ ]N/A
	(vii) Stray electrical currents?	[ ]	[ ]N/A
	(viii) Existing corrosion protection measures?	[ ]	[ ]N/A
	B. The type and degree of external corrosion protection needed to ensure the integrity of the tank system, by means of one of the following:		
	(i) Corrosion resistant materials, e.g. special alloys or FRP?	[ ]	[ ]N/A
	(ii) Corrosion resistant coatings with cathodic protection?	[ ]	[ ]N/A
	(iii) Electrical isolation devices?	[ ]	[ ]N/A
	(d) For UST's components likely to be affected by vehicular traffic, is there a determination of design or operational measures that will protect the tank system from damage?	[ ]	[ ]N/A
	(e) Design considerations to ensure any of the following:		
	A. Does the tank foundation support the load of a full tank?	[X]	[ ]
	B. Does the tank system need to be anchored if placed in a saturated zone or seismic fault zone?	[ ]	[ ] N/A
	C. Will the tank system withstand effects of frost heave?	[ ]	[ ] N/A
5.	The generator must ensure that proper handling procedures were used to install the tank system and prior to covering, enclosing, or placing a new tank system or component in use, an independent, qualified installation inspector or an independent, qualified, registered professional engineer, either of whom is trained and experienced in proper installation of tank systems or components, must inspect		

the system for the presence of: **40 CFR 265.192(b)**

(a) Weld breaks?	[X]	[ ]
(b) Punctures?	[X]	[ ]
(c) Scrapes of protective coatings?	[X]	[ ]
(d) Cracks?	[X]	[ ]
(e) Corrosion?	[X]	[ ]
(f) Other structural damage or inadequate construction or installation?	[X]	[ ]

6. If problems were found, were they repaired before the tank was covered, enclosed, or placed in use? **40 CFR 265.192(b)** [ ] [ ] N/A

7. For UST's, was the system backfilled with noncorrosive, porous, homogeneous material and installed so that the tank and piping were fully and uniformly supported? **40 CFR 265.192(c)** [ ] [ ] N/A

8. Were the tanks and ancillary equipment tested for tightness prior to being covered, enclosed, or placed in use? **40 CFR 265.192(d)** [X] [ ]

9. If problems were found, were repairs made prior to being covered, enclosed, or placed in use? **40 CFR 265.192(d)** [ ] [ ] N/A

10. Is all ancillary equipment supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction? **40 CFR 265.192(e)** [X] [ ]

11. Did the generator provide the type and degree of corrosion protection specified in the design plans? **40 CFR 265.192(f)** [ ] [ ] N/A
    (a) If yes, was the installation of the corrosion protection system supervised by an independent corrosion expert? [ ] [ ]

12. Did the generator obtain and maintain on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the design plans? **40 CFR 265.192(g)** [X] [ ]
    (a) If yes, do the written statements include the certification statement as required in 40 CFR 270.11(d)? [X] [ ]

New Tank System Requirements **[X] Compliance** **[ ] Non-Compliance** **[ ] NA**

Containment and Detection Requirements - EPA Generator 40 CFR 265.193

	YES	NO
13. If the tank is required to have secondary containment, does it meet the following minimum requirements: **40 CFR 265.193(b) and (c)**		
(a). Constructed of or lined with materials compatible with the waste and of sufficient strength?	[X]	[ ]
(b) Placed on a structurally adequate foundation or base?	[X]	[ ]
(c) Provided with a leak detection system capable of detecting releases within 24 hours?	[X]	[ ]
(d) Adequately sloped or designed or operated to drain and remove liquids from leaks, spills or precipitation within 24 hours?	[X]	[ ]

(e) Does the secondary containment include one of the following: **40 CFR 265.193(d)**

A.	External liner?	[X]	[ ]
B.	Vault?	[ ]	[ ]
C.	Double-walled tank?	[ ]	[ ]
D.	Equivalent device approved by the Secretary?	[ ]	[ ]

(f) Does the secondary containment satisfy the following requirements: **40 CFR 265.193(e)**

For External Liner

A.	Adequate capacity to contain 100% of the volume of the largest tank within its boundary?	[X]	[ ]
B.	Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event?	[X]	[ ]
C.	Free of cracks or gaps?	[X]	[ ]
D.	Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs?	[X]	[ ]

For External Liner Constructed of Concrete

E.	Constructed with chemical-resistant water stops at all joints?	[X]	[ ]
F.	Provided with an impermeable coating or lining over the concrete?	[X]	[ ]

For Vaults

G.	Adequate capacity to contain 100% of the volume of the largest tank within its boundary?	[ ]	[ ]
H.	Designed or operated to prevent run-on or infiltration of precipitation into the containment system unless it has excess capacity to contain a 25-year, 24-hour rain event?	[ ]	[ ]
I.	Constructed with chemical-resistant water stops at all joints?	[ ]	[ ]
J.	Provided with an impermeable coating or lining over the concrete?	[ ]	[ ]
K.	Protected against vapor ignition, if required due to ignitable or reactive characteristics?	[ ]	[ ]
L.	Provided with an exterior moisture barrier or designed and operated to prevent migration of moisture into the vault?	[ ]	[ ]

For Double-Walled Tanks

M.	Designed as an integral structure so that outer tank contains any release from inner tank?	[ ]	[ ]
N.	If metal, the interior of the primary tank and external surface of the outer shell is it protected from corrosion?	[ ]	[ ]
O.	Provided with a built-in continuous leak detection system capable of detecting releases within 24 hours?	[ ]	[ ]

14. Is ancillary equipment provided with adequate secondary containment, except aboveground piping (exclusive of flanges, valves, and connections), welded flanges, welded joints, welded connections, sealless or magnetic coupling pumps,

sealless valves, pressurized aboveground piping with an automatic shut-off device, any of which when present, are visually inspected daily for leaks? **40 CFR 265.193(f)** [X] [ ]

Containment and Detection Requirements [X] Compliance [ ] Non-Compliance [ ] NA

Operating Requirements - EPA Generator 40 CFR 265.194

		YES	NO
15.	Is each tank marked with the accumulation start date? **K.A.R. 28-31-4(g)(2)**	[X]	[ ]
	(a) Is each tank emptied at least every 90 days? **K.S.A. 65-3441(a)(4)**	[X]	[ ]
16.	Is each tank labeled with the words "Hazardous Waste?" **K.A.R. 28-31-4(g)(3)**	[X]	[ ]
17.	Are hazardous wastes or treatment reagents placed in the tank system that could cause the tank, the ancillary equipment or secondary containment to rupture, leak, corrode, or otherwise fail? **40 CFR 265.194(a)**	[ ]	[X]
18.	Does the generator use, at a minimum, the following appropriate controls and practices to prevent spills and overflows: **40 CFR 265.194(b)**		
	(a) Spill prevention controls (e.g.,check valve, dry disconnects, etc.)	[X]	[ ]
	(b) Overfill prevention controls (e.g., high level senors or alarms, automatic feed cutoff, bypass to standby tank).	[X]	[ ]
	(c) Maintenance of freeboard in uncovered tank to prevent overtopping by wave or wind action or precipitation.	[ ]	[ ] N/A

Operating Requirements [X] Compliance [ ] Non-Compliance [ ] NA

Inspection Requirements - EPA Generator 40 CFR 265.195

		YES	NO
19.	Does the generator inspect, where present, at least once each operating day the following items: **40 CFR 265.195(a)**		
	(a) Overfill/spill control equipment (waste-feed cutoff or bypass system) to ensure proper working order?	[X]	[ ]
	(b) Above-ground portions of the tanks system to detect corrosion or releases?	[X]	[ ]
	(c) Data from monitoring and leak detection equipment to ensure proper operation?	[X]	[ ]
	(d) Areas around tank and the secondary containment to detect leaks, etc?	[X]	[ ]
20.	If the tank has cathodic protection systems, it must be inspected according to the following schedule: **40 CFR 265.195(b)**	N/A	
	(a) Was proper operation confirmed within 6 months of installation and annually thereafter?	[ ]	[ ]
	(b) Are impressed current sources inspected/tested at least bimonthly?	[ ]	[ ]
	(c) Are records maintained of these inspections?	[ ]	[ ]

21. Are all daily inspections documented and kept on file for three years? **K.A.R. 28-31-4(k)** [ ] [X] 11

Inspection Requirements	[ ] Compliance	[X] Non-Compliance	[ ] NA

Response to Leaks or Spills - EPA Generator 40 CFR 265.196

	YES	NO
22. If the tank system or secondary containment system had a leak or spill or was determined to be unfit for use, was it immediately removed from service? **40 CFR 265.196**	[ ]	[ ]
(a) If yes, was appropriate follow-up actions taken as required by 40 CFR 265.196(a) through (c), including notifying KDHE of the release within 24 hours?	[ ]	[ ]
23. If extensive repair has been conducted on the tank system, was it recertified by an independent, qualified, registered professional engineer in accordance with 40 CFR 270.11(d) and such certification submitted to the KDHE within 7 days after the tank system was returned to service? **40 CFR 265.196(f)**	[ ]	[ ]

Response to Leaks or Spills	[ ] Compliance	[ ] Non-Compliance	[X] NA

Closure Requirements - EPA Generator 40 CFR 265.197

	YES	NO
24. If the tank system or part of the tank system has been closed, did the generator remove or decontaminate all waste residues, contaminated containment components, contaminated soils, and contaminated structures and equipment and manage them as hazardous waste? **40 CFR 265.197(a)**	[ ]	[ ]
25. If all contaminated soils cannot be practically removed or decontaminated, does the generator provide post-closure care under the landfill requirements of 40 CFR 265.310? **40 CFR 265.197(b)**	[ ]	[ ]

Closure Requirements	[ ] Compliance	[ ] Non-Compliance	[X] NA

Special Requirements for Ignitable and Reactive Waste - EPA Generator 40 CFR 265.198

	YES	NO
26. With the exception of emergency situations, have ignitable or reactive wastes been placed in any tank by the generator? **40 CFR 265.198**	[ ]	[X]
(a) If yes, did the generator insure the safety of the operation by one or both of the following methods: **40 CFR 265.198(a)**		
A. Was the waste treated immediately before or after being placed in the tank so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.17(b)?	[ ]	[ ]

B. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? [ ] [ ]

27. If a tank is used to treat or store ignitable or reactive wastes, does the generator meet the National Fire Protection Association's buffer zone requirements for flammable and combustible liquids? **40 CFR 265.198(b)** [ ] [ ]

Ignitable and Reactive Waste	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Special Requirements for Incompatible Waste - EPA Generator 40 CFR 265.199

YES NO

28. If incompatible wastes or incompatible waste and materials are placed in the same tank, is this done under completely controlled and safe conditions as specified in 40 CFR 265.17(b)? **40 CFR 265.199(a)** [ ] [ ]

29. If hazardous waste is placed in a contaminated tank that previously held incompatible waste or materials, did the generator comply with 265.17(b)? **40 CFR 265.199(b)** [ ] [ ]

Incompatible Waste	**[ ] Compliance**	**[ ] Non-Compliance**	**[X] NA**

Air Emissions Requirements - EPA Generator 40 CFR 265.202

YES NO

30. Any tank system operated by an EPA generator must comply with applicable sections of Subpart AA , BB, and CC. Is the generator subject to:

(a) 40 CFR 265 Subpart AA? [ ] [ ]
(b) 40 CFR 265 Subpart BB? [ ] [ ]
(c) 40 CFR 265 Subpart CC? [ ] [ ]
If yes to any, complete the appropriate checklists.

Air Emission Requirements	**[ ] Applicable**	**[X] Not Applicable**

(EPA Generator Stop Here)